

REMARKS

In the Office Action mailed November 29, 2006,¹ the Examiner rejected claims 1-3, 5, 7-11, 13-20, 22, 24-31, 33-37, 39, and 41-48 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,606,708 to Devine et al. ("Devine") in view of U.S. Patent No. 6,226,678 to Mattaway et al. ("Mattaway").

Claims 1-3, 5, 7-11, 13-20, 22, 24-31, 33-37, 39, and 41-48 remain pending. Applicants thank the Examiner for withdrawing the previous rejections. Office Action at 14.

Applicants respectfully traverse the rejection of claims 1-3, 5, 7-11, 13-20, 22, 24-31, 33-37, 39, and 41-48 under 35 U.S.C. § 103(a) as being unpatentable over Devine in view of Mattaway. A *prima facie* case of obviousness has not been established.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, the prior art reference or references, taken alone or combined, must teach or suggest each and every element recited in the claims. See M.P.E.P. § 2143.03. Second, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine the references in a manner resulting in the claimed invention. See M.P.E.P. § 2143. Third, a reasonable expectation of success must exist. See M.P.E.P. § 2143.02. Moreover, each of these requirements must "be found in the prior art, and not based on applicant's disclosure." M.P.E.P. § 2143.

¹ The Office Action may contain statements characterizing the related art, case law, and claims. Regardless of whether any such statements are specifically identified herein, Applicants decline to automatically subscribe to any statements in the Office Action.

The Examiner has not established a *prima facie* case of obviousness because Devine and Mattaway, whether taken individually or in combination, at least do not teach or suggest a method that, for example, “in response to the request, receiv[es] security context information at the first node from the administrative machine, the security context information comprising a virtual address for the first node,” as recited by claim 1. The Examiner alleges that Devine discloses this element in col. 8, lines 32-35 and col. 14, lines 11-14. But these portions of Devine neither discuss receiving a response “at the first node” nor a “virtual address for the first node,” as recited by claim 1. Rather, Devine discloses “DMZ Web servers 24 will re-encrypt the request . . . and forward it . . . to the dispatcher server 26,” not back to the alleged “first node.” Moreover, even assuming Devine did respond to the first node, Devine does not teach or suggest responding with “security context information comprising a virtual address of the first node,” as recited by claim 1.

Mattaway fails to cure these deficiencies of Devine. Although the Examiner cites col. 7, lines 24-28 and col. 18, lines 33-36 of Mattaway, these portions do not discuss a “virtual address.” Rather, Mattaway transmits the actual “IP address of the callee . . . to the first processing unit 12.” Mattaway, col. 7, line 27. An actual IP address is not a virtual address. Moreover, Mattaway sends the IP address of the callee, not the caller (alleged “first node”).

Furthermore, independent claim 1 recites a method including “transmitting a packet from the first process to the second process through the open socket without passing through the administrative machine, the packet comprising the security context information for the first process in the process table” (emphasis added). The Examiner

concedes that Devine does not teach or suggest this element. Office Action at 4. Mattaway similarly does not teach or suggest sending “a virtual address for the first node,” and certainly does not teach or suggest sending this virtual address in a “process table.” The Examiner alleges col. 20, lines 15-23 of Mattaway discloses the claimed “process table.” Office Action at 3-4. The cited portion of Mattaway merely discloses: “Client table 1516A comprises a plurality of records . . . [including an] ‘id’ field [that] comprises a unique ID sequence identifying a particular WebPhone client.” Mattaway, col. 20:15-23. Assuming that the Examiner alleges Mattaway’s “client table” constitutes the claimed “process table”, this is incorrect. Mattaway’s client table does not store a “virtual address”; Mattaway’s client table does not store an address or unique ID for the client, only for other “WebPhone client[s]” for connection; and Mattaway does not transmit the client table “from the first process to the second process,” as recited by claim 1.

For at least the reason that neither Devine nor Mattaway, taken individually or in combination, teaches or suggests each and every element recited by claim 1, no *prima facie* case of obviousness has been established for claim 1. Accordingly, Applicants request that the Examiner withdraw the rejection of independent claim 1 under 35 U.S.C. § 103(a) as being unpatentable over Devine in view of Mattaway.

Independent claims 16, 18, 29, 33, and 35, while of different scope than independent method claim 1, patentably distinguish from Devine and Mattaway for the same reasons as claim 1. Claims 2, 3, 5, 7, 11, 13, 15, 17, 19, 20, 22, 24, 28, 30, 31, 34, 36, 37, 39, 41, and 45-48 are allowable at least based on their respective dependence from allowable independent claims 1, 16, 18, 29, 33, and 35.

Furthermore, claims 7, 24, and 41, in addition to being allowable based on their respective dependence from allowable independent claims 1, 18, and 41, are allowable because Devine and Mattaway fail to teach or suggest the claimed "determining whether the first and second process belong to two different linked channels." Contrary to the Examiner's allegations on page 6 of the Office Action, Devine and Mattaway are both silent with respect to "linked channels" and "determining whether the first and second process belong to two different linked channels." If anything, Devine teaches that "[e]ach HTTP request/reply is a separate TCP/IP connection." Devine, col. 20, lines 56-57.

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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